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Attorneys for Defendant BRENDA M. O. CHUNG (02)

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,) CR. NO. 02-00225 DAE
)
Plaintiff,) STIPULATION AND ORDER
) ALLOWING TRAVEL BY
vs.) DEFENDANT BRENDA M. O
) CHUNG (02)
ANDY S. S. YIP, (01))
BRENDA M. O. CHUNG, (02))
)
Defendants.)

STIPULATION AND ORDER ALLOWING TRAVEL BY DEFENDANT BRENDA M. O. CHUNG (02)

IT IS HEREBY STIPULATED, by and between the parties hereto, that Defendant Brenda M. O. Chung (02) be permitted to travel with her passport from August 31, 2006 through September 16, 2006, to Shanghai, China, Milan and

Vicenza, Italy, and Las Vegas, Nevada, for business-related purposes, including attendance at the Vicenza jewelry fair and meetings with various jewelry suppliers.

IT IS FURTHER STIPULATED that:

- (1) Prior to the obtaining of her passport and departure from the jurisdiction of this Court, Defendant shall provide to Pretrial Services a complete and detailed itinerary of her travel, including all dates and places where she shall be throughout the period of her travel, and shall provide such other information requested by Pretrial Services;
- (2) Defendant may pick up her passport from the Clerk of this Court no earlier than August 9, 2006, and Defendant must return her passport to the Clerk of this Court no later than September 18, 2006. Defendant is being permitted to pick up her passport at an early date, as Defendant's passport is required in order for Defendant to obtain a visa for entry into Shanghai, China;
- (3) There shall be no contact, either directly or indirectly, by Defendant or by any person acting on her behalf, with the Government's cooperating witness named "E.D." in it's second superseding indictment;
- (4) Any variance from the itinerary provided by Defendant to

 Pretrial Services shall constitute a violation of this Court's order, and any contact

with the person referenced in paragraph 2 hereinabove, in any manner described in paragraph 2 hereinabove, shall constitute a violation of this order;

- (5) Any violation of this order shall subject Defendant to a revocation of her pretrial release in this case;
- (6) Any violation of this order shall subject Defendant to additional penalties as provided by law in the instant case;
- (7) Any violation of this order shall subject Defendant to new and additional charges in a separate criminal proceeding as provided by law.

SO STIPULATED.

DATED: Honolulu, Hawaii, August 4, 2006.

/s/ Leslie E. Osborne, Jr.
LESLIE E. OSBORNE, JR., A.U.S.A.
Attorney for Plaintiff United States of America
/s/ Howard K. K. Luke

HOWARD K. K. LUKE
Attorney for Defendant Brenda M. O. Chung (02)

/s/ Julie Wall
JULIE WALL, U.S. Pretrial Services Officer

IT IS SO ORDERED.



/s/ Barry M. Kurren United States Magistrate Judge Dated: August 9, 2006

Cr. No. 02-00225 DAE, <u>U.S. v. Brenda M. O. Chung (02)</u> Stipulation and Order Allowing Travel by Defendant Brenda M. O. Chung (02)